

# HRVOC Stakeholder Group Meeting

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July 23, 2007  
Air Quality Planning Section





# Overview

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- Highly Reactive Volatile Organic Compounds (HRVOC) Rules Overview
- HRVOC Emission Cap and Trade (HECT) Program Overview



# HRVOC Rule Background

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- First version published in January 2003.
- Revised version published in November 2003.
- HRVOC rules with revised cap strategy were adopted and published in December 2004.



# HRVOC Rules

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- HRVOC defined as:
  - ethylene and propylene (all 8 counties)
  - 1,3-butadiene and all isomers of butene (Harris County only)
- Key rule components:
  - Monitoring and testing for flares, vents, and cooling towers
  - fugitive emission requirements
  - short-term cap of 1200 lbs/hr
  - long-term cap and trade program



# HRVOC Emission Cap & Trade Program

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- HRVOC Rules
  - 30 Texas Administrative Code Chapter (TAC) 115, Subchapter H, Divisions 1, 2, and 3
- HECT Program
  - 30 TAC Chapter 101, Subchapter H, Division 6



# HECT Applicability

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- The annual cap on HRVOC emissions applies to all sites in Harris County with a potential to emit of 10 tons per year or more of HRVOC from facilities subject to 30 TAC Chapter 115:
  - Division 1 for vent gas and flares, or
  - Division 2 for cooling towers



# Allocation of Allowances

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- Allowances allocated based on the ratio of the site's level of activity relative to the total level of activity for all sites in Harris County that are subject to the HECT program.
  - Baseline level of activity - 12 consecutive months period during 2000 to 2004.
  - Level of activity based on total HRVOC consumed, produced, stored or loaded.
- Minimum allocation 5 tons.



# Allocation Concerns Raised

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- Final allocation was posted on September 27, 2006.
- Concerns about potential inequities to the allocation methodology have been raised by companies.
- ED has directed staff to assess the potential for allocation inequity and provide recommendations for resolution, if warranted.



# HRVOC Special Inventory

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- Sent HRVOC Special Emissions Inventory Request to subject sites on June 6, 2007.
- Requested actual emissions from monitoring data for the period of February 1, 2006, through January 31, 2007.



# Potential Reallocation of Allowances

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- Staff is reviewing options on revising allocation methodology.
- Staff is seeking suggestions from stakeholders.



# Contact Information

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- HECT program
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- HRVOC rules
  - Lindley Bailey, 512-239-0003
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# Discussion